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4 Proposed Attorney for Fee Examiner  
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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re  
12 PG&E CORPORATION,

13 - and -

14 PACIFIC GAS AND ELECTRIC  
15 COMPANY,

16 Debtors.

- 17 ☐ Affects PG&E Corporation  
18 ☐ Affects Pacific Gas and Electric Company  
19 ☒ Affects both Debtors

20 \* All papers shall be filed in the Lead Case,  
21 No. 19-30088 (DM)

Bankruptcy Case  
No. 19-30088 (DM)  
(Lead Case)  
(Jointly Administered)

Chapter 11

**DECLARATION OF BRUCE A.  
MARKELL IN SUPPORT OF  
APPLICATION FOR ORDER  
AUTHORIZING EMPLOYMENT OF  
SCOTT H. McNUTT AS COUNSEL TO  
FEE EXAMINER**

Judge: Hon. Dennis Montali

21 I, Bruce A. Markell, hereby declare as follows:

22 1. By order entered May 29, 2019 [Docket No. 2267] (the "Fee Examiner Order"),  
23 this court appointed me as the Fee Examiner in these jointly administered cases. In such capacity,  
24 and except as otherwise indicated herein I have personal knowledge of the facts set forth below,  
25 and if called as a witness I could and would competently testify to the matters set forth in this  
26 declaration.

27 2. The Fee Examiner Order authorizes me to retain counsel to aid in the performance  
28 and discharge of my duties. Paragraph 12 of the Fee Examiner Order states that: "The Fee

1 Examiner may retain attorneys and other professionals, assistants, or consultants to the extent he  
2 deems it necessary to discharge his duties. The Fee Examiner's retention of professionals shall be  
3 subject to Court approval under standards equivalent to 11 U.S.C. § 327.”

4 Fee Examiner Order, ¶ 12.

5 3. I have decided that I need local counsel to fully discharge my obligations under the  
6 Fee Examiner Order. To assist me, I have chosen Scott H. McNutt.

7 4. I have read Mr. McNutt’s APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT  
8 OF SCOTT H. McNUTT AS COUNSEL TO FEE EXAMINER (“Application”), and his declaration in  
9 support thereof.

10 5. I have known Mr. McNutt for more than 30 years. I know his strengths; he knows  
11 my weaknesses. I fully support his Application.

12 I declare under penalty of perjury under the laws of the United States of America and the  
13 State of California that the foregoing is true and correct to the best of my knowledge and belief.

14 Executed this 17th day of June, 2019, at Chicago, Illinois.

15  
16 /s/ Bruce A. Markell

17 Bruce A. Markell  
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